

KEANE & ASSOCIATES

AMY C. GROSS, ESQ
Admitted in NY

MAILING ADDRESS:
P.O. BOX 2996
HARTFORD CT, 06104-2996

Direct Dial: 917-778-6462
Email: ACROSS@TRAVELERS.COM

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/23/2020

TELEPHONE: 917-778-6680
FACSIMILE: 844-571-3789

November 18, 2020

BY ECF:

Hon. John P. Cronan
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Travelers Property Casualty Company of America v. Harleysville Insurance Company
Case Number: 20-cv-6689 (JPC)
Our Matter Number: 2020072713

Dear Judge Cronan:

This firm represents the plaintiff, Travelers Property Casualty Company of America (“Travelers”), in the above referenced matter. I write to request an adjournment of the Initial Status Conference in this matter, currently scheduled for November 24, 2020, until December 8, 2020, or to such other date thereafter as is convenient for the Court.

The reason for this request is that, while Defendant Harleysville Insurance Company (“Harleysville”) has not yet appeared in this matter, Travelers has been in contact with Harleysville about this dispute, and the parties are in the process of finalizing a resolution. It is our expectation that this resolution will be concluded before the end of the month, which would in turn obviate the need for Travelers to further pursue this case, the need for the Court to hold the Initial Status Conference, and the need for the parties to prepare any pre-conference submissions.

This is Travelers’ third request for an adjournment of the Initial Status Conference. The Initial Status Conference was originally scheduled for October 16, 2020, but Travelers sought and this Court granted an adjournment to November 9, 2020, because Harleysville had not yet appeared in the action and its deadline to respond to the Complaint was not until after October

Not a Partnership or Professional Corporation All attorneys are Employees of The Travelers Indemnity Company And its Property Casualty Affiliates

CONNECTICUT OFFICE:
ONE TOWER SQUARE
HARTFORD CT, 06183

NEW YORK OFFICE:
485 LEXINGTON AVENUE
6TH FLOOR
NEW YORK, NY 10017

16, 2020. Travelers then sought, and this Court granted, a second adjournment until November 24, 2020, because Harleysville had still not yet appeared in the action, and Travelers planned to reach out to Harleysville and provide a courtesy copy of the Complaint. Travelers has not sought consent from opposing counsel for the relief requested in this letter because no counsel has yet appeared in this matter for Harleysville.

Respectfully,

/s/ Amy C. Gross

Amy C. Gross

Plaintiff's request is GRANTED. The Initial Pretrial Conference scheduled for November 24, 2020, at 12:00 p.m. is hereby adjourned to December 11, 2020, at 3:00 p.m.

SO ORDERED.

Date: November 23, 2020

New York, New York



JOHN P. CRONAN
United States District Judge

Not a Partnership or Professional Corporation All attorneys are Employees of The Travelers Indemnity Company And its Property Casualty Affiliates

CONNECTICUT OFFICE:
ONE TOWER SQUARE
HARTFORD CT, 06183

NEW YORK OFFICE:
485 LEXINGTON AVENUE
6TH FLOOR
NEW YORK, NY 10017